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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Fifteenth session,
Geneva, 29 June-10 July 1998)

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Alternative subsidiary risk label
Chapter 5.2 Marking and Labelling

Transmitted by the Expert from Australia

PROPOSAL

1. This proposal is to enable the use of an alternative subsidiary risk label.

DISCUSSION

2. The UN Model Regulations currently require subsidiary risk labels to conform to models 01 to 08 as illustrated in Clause 5.2.2.2.2.2 (reference Clause 5.2.2.1.1 of the Model Regulations).

3. This requirement is quite specific and makes it necessary for industry to carry two sets of labels for vehicles, packages, portable tanks, etc:

(1) A set of labels which display numerals; and
(2) A set of similar labels which do not display numerals.

4. Associated with these labels are separate print runs for the different labels and numerous other minor irritating requirements which are imposed on industry.

5. The Sub-Committee is invited to consider an alternative, allowing industry to use primary risk labels from which the numeral has been removed as shown below.

6. The benefits, in addition to removing unnecessary burdens on industry, are that it is much clearer that the labels shown below refers to subsidiary risk; it is quite clear that this label is different from that which indicates primary risk.

RECOMMENDATION

7. It is recommended that new text be added to the second sentence of Clause 5.2.2.1.1 and a new model label be added to Clause 5.2.2.2.2.2 as shown below.

"5.2.2.1.1 ... labels identifying subsidiary risk shall display only the appropriate symbol and shall conform to models numbers 01 to 08 **or model 09** illustrated in 5.2.2.2.2.2"

5.2.2.2.2.2 *Specimen subsidiary risk labels*

A Class Label may be used as a Subsidiary Risk label where the numeral is removed as shown below	Below is the resultant Subsidiary Risk label after the numeral is removed from the Class label

(No. 09)